

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Application of Union Electric Company d/b/a)	
Ameren Missouri for Approval of a Variance)	
Regarding the Timing of Its Monthly Filings)	<u>File No. EE-2025-0322</u>
Required by 20 CSR 4240-3.190(3)(A)4-6)	
Under the Monthly Generation Report.)	

STAFF RECOMMENDATION

Comes now the Staff of the Missouri Public Service Commission (Staff), by and through its undersigned attorney and submits its recommendation on the Request for Variance and Waiver filed by Union Electric Company d/b/a Ameren Missouri.

1. On May 29, 2025,¹ Ameren Missouri filed a Request for Variance regarding the timing of its monthly filings before the Commission. Additionally, Ameren Missouri asked for a waiver of the 60-day notice requirement of Rule 20 CSR 4240-4.017.

2. On June 2, the Commission ordered Staff to file its recommendation or status report by June 30.

3. Ameren Missouri's variance request stated that it required additional time to set up a system to track the information required for a Rule 20 CSR 4250-3.190(3)(A)4-6 filing. Ameren Missouri stated that the filings were due on May 31. It stated that a variance would cause no harm to Ameren Missouri's customers or the general public. It alleged that Ameren Missouri is working to build a tracking system in order to provide the new information required under revised rules and that once the tracking system is in place, Ameren Missouri would supplement its Monthly Generation Reports from April 2025 with the required information.

¹ All date references will be to 2025 unless otherwise stated.

4. Rule 20 CSR 4240-3.190 sets out certain reporting requirements for electric utilities and rural cooperatives. Its stated purpose is to provide the Commission with information on developments that “may affect the rendering of safe and adequate service and to enable the commission to thoroughly and fairly investigate certain accidents and events that may have an impact in future electric rate proceedings at the time and in the context in which those events occur.”

5. Rule 20 CSR 4250-3.190(3)(A)4-6 sets out the following filing requirements:

(3) Monthly Reporting of Hourly Data.

(A) Every electric utility shall accumulate the information described below and submit it monthly in EFIS on the last day of the month following the month to be reported:

1. All generating unit outages and derates for all units regardless of size, dispatchability, fuel type, or ownership share;
2. Net system input for the electric utility;
3. Hourly generation for each generating unit both including and excluding hourly station use;
4. Hourly day-ahead cleared generation, hourly real-time generation, and ancillary services for each generating unit;
5. Hourly day-ahead load and real-time load at each load node;
6. Total load for each hour by—
 - A. Wholesale load;
 - B. Sale for resale load; and
 - C. Retail load by—
 - (I) Rate code if customers taking service on a rate code are metered at a consistent voltage; or
 - (II) Rate schedule for each voltage of service offered within each rate schedule. . . .

6. Rule 20 CSR 4240-2.205 states that the Commission may grant variance from or waive any rule or provision of a rule promulgated by the Commission upon a finding of good cause.

7. Rule 20 CSR 4240-2.060 (4) states:

In addition to the requirements of section (1), applications for variances or waivers from commission rules and tariff provisions, as well as those statutory provisions which may be waived, shall contain information as follows:

(A) Specific indication of the statute, rule, or tariff from which the variance or waiver is sought;

- (B) The reasons for the proposed variance or waiver and a complete justification setting out the good cause for granting the variance or waiver; and
- (C) The name of any public utility affected by the variance or waiver.

8. The Staff has reviewed the request for variance and has prepared a Memorandum setting out its investigation, findings, and recommendations. This Memorandum is attached to this cover pleading as **Appendix A**.

9. Ameren Missouri's variance request includes a request for a waiver of the Rule 20 CSR 4240-4.017 sixty-day notice requirement. Rule 20 CSR 4240-4.0117(1)(D) allows such a waiver based upon ". . .a verified declaration from the filing party that it has had no communication with the office of the commission within the prior one hundred fifty (150) days regarding any substantive issue likely to be in the case. . . ." Ameren Missouri's Request for Variance contains this verified declaration.

10. Staff recommends that the Commission grant Ameren Missouri a waiver of the 60-day notice requirement. As set out and explained in **Appendix A** Staff recommends that the Commission grant Ameren Missouri a limited variance from the Rule 20 CSR 4250-3.190(3)(A)4-6 deadlines. Specifically, Staff recommends that the Commission grant Ameren Missouri a variance to submit at a date no later than October 31, 2025, certain information accumulated from April 2025 to September 2025:

- Ancillary services for each generating unit (one of the reporting requirements of 20 CSR 4240-3.190(3)(A)4)); and
- Data requirements of 20 CSR 4240-3.190(3)(A)6.

WHEREFORE, Staff prays that the Commission will accept this filing as compliant with the Commissions orders.

Respectfully Submitted,

/s/ Paul T. Graham #30416
Senior Staff Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Mo 65102-0360
(573) 522-8459
Paul.graham@psc.mo.gov

CERTIFICATE OF SERVICE

The undersigned by his signature below certifies that the foregoing pleading was served upon all persons who have entered an appearance of record in this matter on this June 30, 2025, by electronic filing in EFIS.

/s/ Paul T. Graham

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. EE-2025-0322
In the Matter of Union Electric Company d/b/a Ameren Missouri's Request for
Variance Regarding the Timing of Its Monthly Filings

FROM: Claire M. Eubanks, P.E., Engineering Analysis

/s/ Claire M. Eubanks P.E., Date 06-30-25
Engineering Analysis / Date

SUBJECT: Staff Recommendation to approve Ameren Missouri's Request for a Variance

DATE: June 30, 2025

OVERVIEW

On May 29, 2025 the Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed a Request for a variance from Commission rule 20 CSR 4240-3.190(3)(A)4-6, revisions effective March 30, 2025. The newly effective rule continues to require certain information to be accumulated monthly and submitted the following month. However, the actual information being provided was expanded and the rule requires the submission to be in a standard format using the templates provided by the Commission.

Staff reviewed the request by Ameren Missouri and its most recent monthly report filed on May 30, 2025 (BEGR-2025-1762), and supports a limited variance. Specifically, Staff recommends the Commission grant Ameren Missouri a variance to submit at a date no later than October 31, 2025, certain information accumulated from April 2025 to September 2025:

- Ancillary services for each generating unit (one of the reporting requirements of 20 CSR 4240-3.190(3)(A)4); and
- Data requirements of 20 CSR 4240-3.190(3)(A)6.

DISCUSSION

In its pleading, Ameren Missouri explained that it is building a tracking system to facilitate providing the information required under the revised rules. Ameren Missouri further represents that once the tracking system is in place, Ameren Missouri will supplement its Monthly Generation Reports from April 2025 on with the required information. Thus, Ameren Missouri is accumulating

the required data and it is a matter of time for the supplemental reports to be filed. Additionally, Ameren Missouri represents that it will continue to file its monthly reports under Commission rule 20 CSR 4240-3.190.

Commission rule 20 CSR 4240-3.190(3)(A)4-6 states:

(3) Monthly Reporting of Hourly Data.

(A) Every electric utility shall accumulate the information described below and submit it monthly in EFIS on the last day of the month following the month to be reported:

...

4. Hourly day-ahead cleared generation, hourly real-time generation, and ancillary services for each generating unit;
5. Hourly day-ahead load and real-time load at each load node;
6. Total load for each hour by— A. Wholesale load; B. Sale for resale load; and C. Retail load by— (I) Rate code if customers taking service on a rate code are metered at a consistent voltage; or (II) Rate schedule for each voltage of service offered within each rate schedule; and

Commission rule 20 CSR 4240-3.190(3)(B) states:

(B) The information in this section shall be provided in an electronic format from which the data can be easily extracted for analysis in spreadsheet or database software using the templates provided by the commission.

Staff reviewed the filing made by Ameren Missouri on May 30, 2025 (BEGR-2025-1762), and notes that Ameren is providing hourly day-ahead cleared generation and hourly real-time deviations for each generating unit. Thus, the requested variance from 20 CSR 4240-3.190(3)(A)4 is needed only for the provision of ancillary services for each generation unit. Additionally, Staff notes that the data required under 20 CSR 4240-3.190(3)(A)5 was also provided in BEGR-2025-1762, and, thus, a variance from 20 CSR 4240-3.190(3)(A)5 is not needed.

In reviewing Ameren Missouri's BEGR-2025-1762 submission, Staff also notes two issues with the data reported under 20 CSR 4240-3.190(3)(A)1 and (3)(A)3. Ameren Missouri did not report the cause code definition associated with outages as contemplated on the provided templates. Additionally, Ameren Missouri provided the net hourly generation under (3)(A)3 rather than reporting hourly generation with and without hourly station use. Staff has requested clarification from Ameren Missouri regarding these data issues.

Ameren Missouri represented to Staff via email that it anticipates its new tracking system to be complete in 6 months or less. Staff anticipates utilizing the data in Commission rule 20 CSR 4240-3.190(3)(A)4-6 in general rate cases or other cases where production cost modeling would benefit the Commission. At this time, Ameren Missouri has not filed a notice of intended case filing related to a general rate case. Additionally, Ameren Missouri is collecting the data and will be able to provide at a later date.

CONCLUSION

Staff reviewed the request by Ameren Missouri and its most recent monthly report filed on May 30, 2025 (BEGR-2025-1762), and supports a limited variance. Specifically, Staff recommends the Commission grant Ameren Missouri a variance to submit at a date no later than October 31, 2025, certain information accumulated from April 2025 to September 2025:

- Ancillary services for each generating unit (one of the reporting requirements of 20 CSR 4240-3.190(3)(A)4)); and
- Data requirements of 20 CSR 4240-3.190(3)(A)6.

